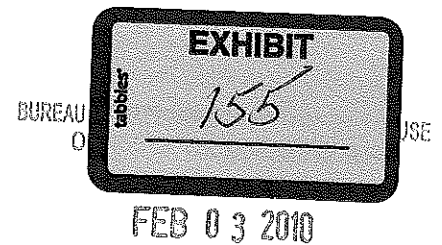


Ed Edelson  
782 Main Street N.  
Southbury, CT 06488  
ededelson@charter.net



January 30, 2010

Paul Stacey, DEP  
79 Elm Street  
Hartford, CT 06106

RE: Comments on Minimum Streamflow Regulations

Dear Mr. Stacey,

After reviewing the proposed Minimum Streamflow Regulations, I have come to the position to **not** support their promulgation in their current form. I do not do this lightly given that the last five years I have been a board member and Executive Director of the Pomperaug River Watershed Coalition, which has been at the forefront of developing the science to help better understand streamflow's affect on the environment.

The approach chosen tries to be comprehensive but I fear that it is overly bureaucratic and cumbersome and therefore will be unenforceable, especially given the current staffing at DEP. The situation today with regard to enforcement is already unfair and unworkable. Current violators of diversion permits cannot be adequately monitored and corrected due to lack of staff and resources. For example, I only found out at the recent briefings that there are regulations regarding streamflow in the Pomperaug River today since it is a stocked stream, but this fact was never brought forward even when we had the severe drought in 2007. Granted the current regulations do not apply to every stream, but if we can't apply current regulations to existing streams, how can we expect the situation to improve when we expand the number of covered streams exponentially plus add the implications of different flows for different bioperiods.

The response by the water suppliers is also very concerning. Clearly they have gone into defensive mode instead of looking at the concerns about the environmental implications of low streamflow as an opportunity to improve their business model. This is shameful and demonstrates their lack of understanding of the relationship between their business and the environment that it so closely depends upon. Creating an adversarial relationship with them as these regulations will surely do, will not solve the situation. In fact, it will most likely create a non-level playing field with some communities being pro-active while others fight the regulations and use this to attract more development to lower their tax rates – the natural result of a state so dependent on property taxes to support each town. Instead, what should

be done is to foster regional development plans that are focused on sustainability and involve all major stakeholders.

I find myself surprised at my opposition to these regulations. However, I can only see a long protracted effort to get them passed and the lack of resources to enforce them once they are passed. Let's focus on the regulations we have, and provide support to demonstrate to all stakeholders that working together we can have sustainable businesses and environment.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Ed Edelson". The signature is written in dark ink on a white background.

Cornucopia at Oldfield  
782 Main Street North  
Southbury, CT 06488

Paul Stacey, DEP  
79 Elm Street  
Hartford, CT 06106

06106+5127

06106+5127

